

PGS 1-6

+
EXHIBITS - 1-30

ROBERT MCGUFFEE ID NO. 1040469

1 SOUTHERN DESERT CORRECTIONAL CTN. LOVELOCK, CORRECTIONAL, CENTER
 2 20825 GOLD CREEK RD. 1200 PRISON RD
 3 P.O. BOX 208 LOVELOCK, NV, 89419
 INDIAN SPRINGS, NV 89010

4 UNITED STATES DISTRICT COURT
 5 DISTRICT OF NEVADA

ROBERT, ADAM, MCGUFFEE }

CASE NO.: 3:16-cv-00356

10 v. TRAVIS BENNETTE ET AL
 11 STATE OF NEVADA AND
 12 DEPARTMENT OF CORRECTIONS

DEPT. NO.: _____

DOCKET: _____

13 Motion FOR A Immediate ORDER to stop the ATTACK ON MY
 14 CRIMINAL POST CONVICTION ATTORNEY MARY LOU WILSON ESO, THIS
 15 ATTACK is PROOF of RETALIATION AND Continued TORTURE of me.
 16 AND Below All Information in this motion AS EVIDENCE, AND Supporting Documents

17 COMES NOW, ROBERT, ADAM MCGUFFEE, herein above respectfully
 18 moves this Honorable Court for an Immediate INJUNCTIVE ORDER STOPPING
 19 THE Continued RETALIATION, AND TORTURE of ROBERT MCGUFFEE
 20 By Issuance a ORDER STOPPING THE ATTACK ON MARY LOU WILSON ESO

21 This Motion is made and based upon the accompanying Memorandum of Points and
 22 Authorities, AND A WRIT OF MANDAMUS, AND PETITION, Filed By MARY LOU WILSON
 23 AND RELIEF SOUGHT BY ROBERT MCGUFFEE Please see EXHIBIT 1 and 2 1-30 PGS
 DATED: this 7TH day of September, 2016

24 BY: Robert G. McGuffey
 25 Robert, ADAM MCGUFFEE 1040469
 26 Defendant In Proper Personam

27

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
NO COPY	
SEP 15 2015	

28 CLERK US DISTRICT COURT
 DISTRICT OF NEVADA
 BY: *[Signature]* DEPUTY

MEMORANDUM OF POINTS AND AUTHORITIES
AND WRIT OF MANDAMUS AND PROHIBITION. IN SUPPORT
OF SAID MOTION. PRAYER FOR RELIEF

1 My Attorney MARY Lou Wilson Esq is UNDER ATTACK
 2 By THE STATE OF NEVADA and its officers AND
 3 Employees this is not only a ATTACK ON HER, But
 4 A ATTACK ON THE Constitutional Rights OF EVERY
 5 AMERICAN. MARY Lou Wilson is A PRIVATE LAWYER IN
 6 good standing with the NEVADA STATE BAR And Has
 7 Been PRACTicing Law Since 1987, "Please see attached
 8 Affidavit of MARY Lou Wilson" Her PRACTice ONLY Accepts
 9 Indigent Post Conviction Clients. MARY Lou Wilson's
 10 Success Rate of FAVORABLE outcomes And Rulings
 11 ON BEHALF OF HER Clients, And HER Refusal to
 12 CATER, ACCOMMODATE AND dispose OF CASES ASSIGNED
 13 to HER BY THE STATE OF NEVADA, IN A FAVORABLE MANNER
 14 to the STATE OF NEVADA, and its OFFICERS, and EMPLOYEES.
 15 Because of HER Refusal to THROW HER Clients
 16 UNDER the BBS, SITE HAS INFURIATED THE BEFORE
 17 Mentioned PARTIES. "Please See Petition FOR WRIT OF
 18 MANDAMUS, OR ALTERNATIVELY P WRIT OF PROHIBITION,"
 19 My Case Specifically CR12-0465, And THE IRREFUTABLE
 20 Evidence THAT SUPPORTS INEFFECTIVE ASSISTANCE OF
 21 COUNSEL, AND A PLEA THAT WAS PROCURED BY TORTURE
 22 BY EXCESSIVE AMOUNTS OF SOLITARY CONFINEMENT OF
 23 A MENTALLY ILL MAN WHO SUFFERS FROM P.T.S.D. AND
 24 WHIS ONE CRIME IS UNCONTROLLABLE VERBAL OUTBURSTS
 25 due to Being Sick, WHO WAS DENIED a Constitutional
 26 BAIL AMOUNT, "100,000 CASH ONLY." And AS A PRE-TRIAL
 27 detainee ^{was} refused a PRRAGIMENT, and PRELIMINARY

1 Hearing For 8mos. I've Been With MARYLOU WILSON
 2 For almost 2 yrs. she was appointed Jan. 22, 2015.
 3 Without HER REPRESENTATION, HER ASSISTANTS, AND HER
 4 INVESTIGATORS, AND THE EXPERT WITNESS. AND MY 6TH
 5 AMENDMENT RIGHT TO ENJOY A MEANINGFUL RELATIONSHIP
 6 WITH COUNSEL WHICH HAVE TAKEN YEARS TO DEVELOP
 7 PROVEN BY THE DATE OF INITIAL APPOINTMENT IS IN
 8 JEOPARDY!, AND IS CLEAR EVIDENCE OF RETALIATION
 9 AND CONSPIRACY TO INTENTIONALLY HAMPER, STOP, DETER,
 10 A FAVORABLE RULING OR OUTCOME WHICH WOULD IMMEDIATELY
 11 RELIEVE ME OF THE CONTINUED THREATS INTIMIDATION
 12 AND TORTURE, OF CONTINUED FALSE IMPRISONMENT AND
 13 SIXTH CONFINEMENT. IT'S MY BELIEF THAT BECAUSE
 14 OF MY SUIT AGAINST N.D.O.C., AND THE STATE OF NEVADA,
 15 AND MARYLOU'S SUCCESS ON BEHALF OF HER CLIENTS,
 16 THE WASHOE COUNTY DISTRICT ATTORNEY'S OFFICE, AND
 17 THE ALTERNATE PUBLIC DEFENDERS OFFICE AND N.D.O.C.
 18 ITS OFFICERS AND EMPLOYEES ARE TRYING TO STOP AND
 19 PREVENT ANY FAVORABLE OUTCOME OR RULING IN MY
 20 FAVOR BY VIOLATING MY 6TH AMENDMENT CONSTITUTIONAL
 21 RIGHTS, BY DEMANDING THAT MARYLOU WILSON STOP
 22 WORKING IMMEDIATELY ON MY CASE. I'M REQUESTING
 23 IMMEDIATE FEDERAL HELP. MARYLOU'S REMOVAL FROM
 24 MY CASE WOULD IN FACT CHANGE THE OUTCOME OF MY
 25 SEPT 23RD 2016 EVIDENTIARY HEARING AND WOULD CAUSE
 26 IRREVERSIBLE HARM TO ME, AND CAUSE MY CONTINUED
 27 TORTURE BY THE NEVADA DEPARTMENT OF CORRECTIONS.

ADDITIONAL FACTS OF THE CASE:

INJUNCTIVE RELIEF

1 Relief Sought: A stop on, or, of the attack on MARY LOU WILSON
2 A order for the continued representation of MARY LOU
3 WILSON Esq., To Be Removed From the Custody of
4 the state of NEVADA, and placed in Federal Custody
5 in order to Alleviate the continued RETALIATION,
6 THREATS, Intimidation of a Mentally ILL PRISONER, and
7 the Continued Violation of Civil and Constitutional
8 Rights, and to be free from CRUEL and UNUSUAL
9 PUNISHMENT. I Robert, ADAM, McGUFFEE A former
10 Federal Officer with the U.S. Department of
11 Homeland Security PRAY THAT this Honorable Court
12 GRANT my INJUNCTIVE RELIEF and put a stop to the
13 Continued CRIMES, and INJUSTICES BY the State of
14 NEVADA its officers and employees.

15

16

17

18

19

20

21

22

23

24

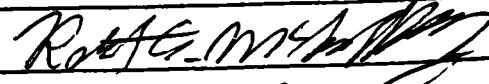
25

26

27

28

DATED this 18th day of September, 2016



1040469

ROBERT, ADAM, McGUFFEE
Acting in PRO SE.

PUNITIVE DAMAGES SOUGHT

IN CASE 3:16-CV-00356 TO COINCIDE
WITH INJUNCTIVE RELIEF

1 \$1000⁰⁰ DOLLARS A DAY FOR EVERY DAY OF MENTAL
 2 TORTURE AND ANGUSTIA BY CONTINUED THREATS INTIMI-
 3 ATION. BY EXCESSIVE AMOUNTS OF SOLITARY CON-
 4 FINEMENT, RETALIATORY NOTICE OF CHARGES, AND THE
 5 BLATANT REFUSAL OF ACKNOWLEDGEMENT OF MY SEVERE
 6 MENTAL HEALTH CONDITIONS, AND CONTINUED FORCED
 7 INTERACTIONS WITH THE VERY PEOPLE I'M IN FEAR
 8 OF, AND WHO CONTINUE TO PLESE INMATES. ALSO FOR
 9 FALSE IMPRISONMENT. THE MENTAL TORTURE OF SOLI-
 10 TARY CONFINEMENT HAS BEEN PROVEN BY REPUTED
 11 PSYCHIATRIST, AND PSYCHOLOGIST TO HAVE DEVASTATING
 12 MENTAL HEALTH EFFECTS, AND HAS IN FACT BEEN DEEMED
 13 AS TORTURE. PLEASE SEE SENATOR GRIFFIN'S HEARING REPORT
 14 SCIB COMMITTEE 3 ON THE JUDICIARY CRIME AND CORRECTIONS
 15 AND EFFECT OF SEGREGATED CONFINEMENT OF PRISONERS. ALSO
 16 SENATOR JOHN McCAIN'S TESTIMONY TO CONGRESS ABOUT THE
 17 TORTURE OF SOLITARY CONFINEMENT AS A PRISONER.
 18 A 1000⁰⁰ DOLLARS A DAY FOR EVERY DAY I'M ENCLUSED
 19 Since Feb 10th, 2016 UNTIL THE PRESENT, AND INTO
 20 THE FUTURE AS LONG AS THE TORTURE PERSISTS.

22 Dated this 8th day of September, 2016

23 Robert A. McGuire

24 1040469

25 ROBERT, ADAM, MCGUIRE

26 Acting in PRO-SE-

1 AFFIDAVIT OF: ROBERT, ADAM, MCGUFFEY

2 STATE OF NEVADA)
3 COUNTY OF ~~CLARK~~) ss:
4 WASHOE

5 TO WHOM IT MAY CONCERN:

6 I, Robert, ADAM MCGUFFEY, the undersigned, do hereby swear that
7 all statements, facts and events within my foregoing Affidavit are
8 true and correct of my own knowledge, information and belief, and
9 as to those, I believe them to be True and Correct. Signed under the
10 penalty of perjury, pursuant to, NRS. 29.010; 53.045 ; 208.165, and state
11 the following:

12 MARY LOU WILSON IS my ATTORNEY OF RECORD ON CASE
13 CR-120445 THE Evidentary Hearing is ON September 22nd, 2016
14 SHE IS UNDER ATTACK BY THE STATE OF NEVADA'S, OFFICERS
15 AND EMPLOYEES, AND N.O.C., AND SO AM I.

16 I continue to BE Intimidated, threatened AND tortured BY
17 EXCESSIVE SOLITARY Confinement, AND continued N.O.C.'S
18 I HAVE P.T.S.D AND IM BIPOALR, AND HAVE ATTACHMENT disorder
19 I AM Indigent, AND I AM NOT SCHOOLED IN LAW
20 IM IN SOLITARY Confinement AND IM FEAR FOR my LIFE AND
21 Continued RETALIATION AND CONSPIRACY BY THE STATE OF NEVADA
22 N.O.C. its OFFICERS AND EMPLOYEES.

23 IF THE STATE OF NEVADA AND N.O.C. ITS OFFICERS AND EMPLOYEES
24 ARE SUCCESSFUL IN THERE ATTACK ON MARY LOU WILSON, THE RESULT
25 WILL HAVE DIAIR CONSEQUENCES ON my POST CONVICTION APPEAL.

26 FURTHER YOUR AFFIANT SAYETH NAUGHT.

LOVELOCK, NEVADA

27 EXECUTED At: Indian Springs, Nevada, this 8th Day of September,
28 2016.

BY: Robert Adam MCGUFFEY #1090469
Post Office Box 203 (SDCC)
Indian Springs, Nevada. 89070-11
Affiant, In Propria Personam:
1200 PRISON RD
LOVELOCK, NV. 89441

Exhibit List

Exhibit 1.) Petition For Writ of Mandamus
PG-1-28 OR Alternatively, A Writ of PROHIBITION

Exhibit 2.) AFFIDAVIT OF MARY Lou Wilson
AFFIRMING RETALIATION BY THE STATE OF NEVADA
PG 10F1 AND EFFECTIVELY PUTTING HER OUT OF BUSINESS
AND CAUSING SUBSTANTIAL HARM TO HER CLIENTS

EXHIBIT 1

Petition FOR WRIT OF MANDAMUS, OR
ALTERNATIVELY, A WRIT OF PROHIBITION

PGS 1-28

EXHIBIT 1

1 IN THE SUPREME COURT OF THE STATE OF NEVADA
2

3 THE LAW OFFICE OF MARY LOU WILSON, INC.;
4 CODIE MICHAEL SCOTT WALKER; CR12-0319A
5 ROBERT ADAM MCGUFFEY; CR12-0465
6 MIGUEL OMAR OJEDA-ENRIQUEZ; CR11-0482 and No. 69803
7 IGNACIO VALENCIA; CR10-2173
8 AURORA RODRIGUEZ-PEREZ; CR11P1020B and No. 70745
9 MOHAMED KAMALAUDEEN; CR08-0196 and No. 69247
10 D'VAUGHN KING; CR12-1160
11 DAVID SANCHEZ-DOMINGUEZ; CR10-0866 and No. 70622
12 JOSE FRANCISCO; CR12-2051
13 LUIS EDUARDO MARTINEZ; CR13-1937 and No. 69641
14 DONALD JACKSON; CR12-1617
15 ANTHONY EUGENE THOMAS; CR09-0207
16 AIRELL SAWYER; CR06P1022 and #67829
17 ROBERT SCHNUERINGER, CR12-0326A

Electronically Filed
Aug 26 2016 04:32 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

18 Petitioners, ADKT No. 411
19

20 vs.
21

22 THE SECOND JUDICIAL DISTRICT COURT-
23 INDIGENT DEFENSE REPORT IMPLIMENTING
24 IN THE MATTER OF THE REVIEW OF ISSUES CONCERNING
25 REPRESENTATION OF INDIGENT DEFENDANTS
IN CRIMINAL AND JUVENILE DELINQUENCY CASES;
(ADKT No. 411) and
THE MODEL COURT SELECTION COMMITTEE,

26 Respondents.
27

28 PETITION FOR WRIT OF MANDAMUS, OR ALTERNATIVELY,
29 A WRIT OF PROHIBITION

1 This is a Petition for Writ of Mandamus, or alternatively, a writ of prohibition.
2 This Court may elect to exercise its discretion and consider the merits of this writ
3 petition in the interest of sound judicial economy and administration. *Cote H. v.*
4 *Eighth Judicial Dist. Court*, 124 Nev. 36, 39, 175 P.3d 906, 908, (2008) (noting
5 that this Court has complete discretion to determine whether to consider a petition
6 for a writ of mandamus or prohibition and that even when an arguably adequate
7 remedy exists, this Court may exercise its discretion “under circumstances of
8 urgency or strong necessity, or when an important issue of law needs clarification
9 and sound judicial economy and administration favor the granting of the petition”
10 (initial quotation marks omitted)).”
11

12 A writ of mandamus is available to compel the performance of an act that the
13 law requires as a duty resulting from an office, trust, or station or to control an
14 arbitrary or capricious exercise of discretion.” *Int'l Game Tech., Inc. v. Second*
15 *Judicial Dist. Court*, 124 Nev. 193, 197, 179 P.3d 556, 558 (2008); NRS 34.160.
16

17 **History**

18 On August 22, 2016 post conviction counsel, Wilson, (Wilson) received a letter
19 from Jennifer Lunt, Alternate Public Defender, as representative of the Model
20 Court Selection Committee. Ex. 1. Wilson immediately contacted Court
21 Administrator, Robert C. Bell, with a list of open and pending cases, which
22 included seven (7) scheduled evidentiary hearings. Ex. 2 and 3.
23

1 Within the letter from the Model Court Selection Committee, it specifically
2 advised that all open and pending cases were to be taken from Wilson and
3 reassigned to different lawyers. Ex. 1.
4

5 **Prayer for Relief**

6 Wilson, requests this Court prohibit the Model Court Selection Committee from
7 enforcing its decision to preclude Wilson from receiving any new cases from the
8 Court Administrator and take away all open and pending cases; remove the
9 Alternate Public Defender and Washoe County Public Defender from the
10 Committee; preclude members of the Washoe County District Attorney's Office
11 from interfering with the Committee's decision-making; and mandate the
12 Committee to reinstate Wilson to retain the ten (10) open and pending cases. Ex. 4,
13 ADKT 411 Ex. 5, A, pp. 18-22.

16 **Jurisdiction**

17 Wilson has no plain, speedy, and adequate remedy in law from the Model Court
18 Selection Committee's decision. NRS 34.170.

20 Within the Second Judicial District Court-Indigent Defense Report
21 implementing the Matter of the Review of Issues Concerning Representation of
22 Indigent Defendants in Criminal and Juvenile Delinquency Cases for ADKT No.
23 411, Appointment of Private Attorneys, does not provide any appellate remedy
24 from its Model Court Selection Committee's decision. Ex. 5.

1 **Arguments**

2 I. The Model Court Selection Committee relied upon subjective criteria to
3 remove Wilson from her open and pending cases, making their decision
4 arbitrary and capricious

5 The criteria that the Model Court Selection Committee should apply, according
6 to the Second Judicial District Court – Indigent Defense Report, provides: On an
7 ongoing basis, the Appointed Counsel Selection Committee shall:

8 1. Review the lists created and modify membership as the Committee deems
9 appropriate;

10 There are no objective standards that a reasonable post conviction attorney
11 could apply to the indigent defense practice.

12 a. Annually review the performance and qualifications of attorneys on the
13 Appointed Counsel lists;

14 Wilson had her Independent Contractor Agreement For Indigent Defense
15 Services renewed from 2008 to June 30, 2017.

16 b. Annually solicit input from Judges, and others familiar with the practice of
17 criminal defense, juvenile and family law where appointed counsel are
18 utilized;

19 Wilson has learned that the complaining party regarding her performance with
20 the complaints to the Model Selection Committee have come from opposing

1 counsel in contested cases, Chief Appellate Deputy District Attorney, Terrence P.
2 McCarthy, showing bias. Ex. 6.

3 c. Review any complaints from clients;

4 The Model Selection Committee has not received any complaints from her
5 clients. Ex. 1. In fact, the Petitioner in one of the two Nevada Supreme Court cases
6 that Chief Appellate Deputy District Attorney Terrence P. McCarthy complained
7 about, Craig Hoffman, sent a letter to Wilson after she was removed and indicated
8 that he was disappointed that Wilson was no longer going to be his counsel of
9 record. Ex. 19.

10 d. Review the history of participation in training of each new applicant and
11 each contract, hourly and capital case list attorney receiving appointment;

12 The Model Selection Committee has not complained about Wilson's
13 participation in training.

14 e. Determine eligibility and selection of appointed counsel for new or
15 continued participation.

16 After the one meeting with The Model Selection Committee on November 9,
17 2015, regarding the two (2) Nevada Supreme Court decisions, Coleman and
18 Hoffman, Jennifer Lunt advised Wilson that there would be no new cases given to
19 her until the Committee had reached a decision. Ex. 6.

20 //

1 Wilson did not hear back from the Committee until August 22, 2016, ten (10)
2 months later, which terminated open and pending cases. Ex. 1
3

4 **Ex. 5, Section V, A, 5**

5 The Model Selection Committee has chosen two (2) Nevada Supreme Court
6 Orders to utilize as grounds for termination of Wilson's, services.

7 Within the August 18, 2016 letter, the following reason was provided,
8
9 "The first involved two sanctions imposed by the Nevada Supreme Court." Ex.
10 1, 7, (Coleman) and Ex. 8, (Hoffman).

11 Within the Nevada Supreme Court decision in Ronnie Money Coleman, No.
12 67909, filed October 20, 2015, this Court reversed and remanded the matter to the
13 district court for further proceedings consistent with the order. Ex. 7.

14
15 There were no sanctions imposed by this Court.

16 Within the Nevada Supreme Court decision in Craig Allen Hoffman v. The
17 Second Judicial District Court of the State of Nevada, in and for the County of
18 Washoe; the Honorable Jerome Polaha, District Judge; and the State of Nevada,
19 No. 68441, this Court Ordered the petition Granted, in part, and Directed the Clerk
20 of the Court to Issue A Writ Of Mandamus instructing the district court to rescind
21 its prior Order closing the post conviction proceedings, remove Ms. Wilson as
22 counsel in the post conviction proceedings, and appoint new counsel to assist
23 Hoffman in the proceedings.

1 Within footnote two (2) this Court stated, "Ms. Wilson is cautioned that such
2 future dereliction may result in other sanctions considered necessary by the district
3 court, including referral to the State Bar of Nevada. Ex. 8.
4

5 As indicated to the Model Selection Committee on November 9, 2015, Wilson
6 suggested to this Court that she be removed from Hoffman's post conviction case
7 in lieu of closing the Hoffman proceedings. Ex. 9, p. 8.
8

9 Additionally, it appeared that this Court's footnote was cautionary in nature and
10 did not result in referral to the State Bar of Nevada. Ex. 6.
11

12 Within the August 18, 2016 letter it reads, "This is the second time the Model
13 Court Selection Committee has been notified of issues with your level of
14 performance in the Second Judicial District Court. The second incident involves
15 serious allegations of lack of candor to the court, and deficient pleadings." Ex. 1.
16

17 This letter does not contain anything that could be considered a serious
18 allegation of lack of condor to the court and deficient pleadings. Ex. 1.
19

20 After Wilson's meeting with the Model Court Selection Committee on
21 November 9, 2015, where all future cases were suspended until the Committee
22 contacted Wilson, she received a letter from Jeremy Bosler dated June 1, 2016,
23 eight (8) months later.
24

25 This letter from the Model Court Selection Committee was received by Wilson
almost one month later on June 27, 2016. The letter requested Wilson answer
7

1 questions posed regarding the post conviction case of Mary Anne Mattoon v.

2 Warden. F.M.W.C.C and the State of Nevada, CR10-1294. Ex. 10.

3 It was unclear who launched this complaint to the Model Court Selection
4 Committee. However, consistent with the prior complaint, Chief Appellate Deputy
5 District Attorney, Terrence P. McCarthy, opposed Ms. Mattoon's motion to
6 withdraw her petition in a telephone conference between parties. Ex. 6.

7 Wilson responded to Mr. Bosler through emails that the questions posed in the
8 letter would be answered immediately. Ex. 11.

9 Mr. Bosler was also advised that Wilson requested, received, and sent a copy of
10 the transcript from the court proceedings to assist the Model Court Selection
11 Committee. Ex. 12 (emails) and Ex. 13 (transcript of proceedings).

12 Within the transcript of the Mattoon hearing, the Honorable Judge Elliott Sattler
13 made the following comments with regard to Wilson's experience and diligence in
14 the Mattoon case. Judge Sattler stated, ". . . I appreciate all the work that you've
15 put in on Ms. Mattoon's part. Certainly you have not been derelict in your duties in
16 attempting to represent Ms. Mattoon to the best of your ability." Ex. 13, p.6, L. 22-
17 24 and p. 7, L. 1. The district court went on to state, ". . . The Court has appointed
18 you counsel. Counsel has been very experienced - - or is very experienced. She has
19 been working diligently on your behalf." Ex. 13, p. 7, L. 21-24. The Court also
20 noted, ". . . The person you probably should appreciate, frankly, the most is Ms.
21
22
23
24
25

1 Wilson. As I can see from the document that she filed yesterday, she has been
2 working very diligently on your case as she does with all of her clients.
3

4 She's put in a lot of work on it." Ex. 13, p. 12, L. 24 and p. 13, L. 1-5.
5

6 Wilson, answered Mr. Bosler's letter within six (6) days, of the Model Court
7 Selection Committee's questions regarding the Mattoon case on July 2, 2016,
8 provided a ten (10) page response letter with sixty (60) exhibits. Ex. 14 and 18.
9

10 Wilson, received no response from Mr. Bosler or the Model Court Selection
11 Committee regarding these questions about the Mattoon case and no hearing was
12 held. Ex. 6.
13

14 As such, the actions of the Model Selection Committee terminating services of
15 Wilson were based upon purely subjective criteria and inconsistent with the
16 unsolicited opinions of the Honorable Judge Elliott Sattler within the transcript of
17 proceedings on the very case that Mr. Bosler's letter was directed. Ex. 5, Section
18 V, A, 5 and Ex. 13.
19

20 II. The Second Judicial District Court – Indigent Defense Report Implementing
21 the Matter of the Review of Issues Concerning Representation of
22 Indigent Defendants in Criminal and Juvenile Delinquency Cases (ADKT
23 No. 411); and The Model Court Selection Committee does not provide
24 for an appeal or any other remedy from the decision of the Model Court
25 Selection Committee withdrawing counsel from open and pending cases

in violation of Wilson's Due Process Rights and the ten (10) post conviction open and pending cases

A review of the above-entitled document provides no appellate review from the Model Court Selection Committee's decision of August 18, 2016, which stated, "You will no longer be appointed cases under the Appointed Case Counsel Administrator. Please take immediate steps to return all of your open and pending cases to the Office of Bob Bell, for re-assignment of counsel." Ex. 1.

In contrast, the Second Judicial District Court – Indigent Defense Report Implementing the Matter of the Review of Issues Concerning Representation of Indigent Defendants in Criminal and Juvenile Delinquency Cases (ADKT No. 411) does provide for an appeal regarding fee disputes. Ex. 5, V. B. 1. b. (4) provides: “The payment of fees and expenses of contracted appointed counsel by Washoe County shall be governed by contract between counsel and Washoe County subject to appeal as described in III. E. 3. b., c., and d.

The above-entitled sections provide: b. The extent and cost of these services shall be approved by the Appointed Counsel Administrator; c. The determination of the extent and approval of the amounts made by the Appointed Counsel Administrator may be appealed to the Washoe County Manager or their designee; d. Appeals from the determination of the County Manager or their designee, as to

1 the extent and amount allowable for these fees, may be made to the Chief Judge of
2 the Second Judicial District Court.

3 As such, there was no such appellate procedure in place for the action taken by
4 Ms. Lunt on behalf of the Model Court Selection Committee dated August 18,
5 2016, advising Wilson that she would no longer be appointed cases under the
6 Appointed Case Counsel Administrator and to immediately take steps to return all
7 open and pending cases to the Office of Bob Bell, for reassignment of counsel. Ex.
8

9 1.

10 One meeting was held on November 9, 2015, from an email sent to post
11 conviction counsel, Wilson, concerning the two (2) Nevada Supreme Court
12 decisions, which Chief Appellate Deputy District Attorney Terrence P. McCarthy
13 complained about to the Model Court Selection Committee.

14 An email was sent to Wilson on November 4, 2015 from Ms. Lunt requesting
15 Wilson's presence at the Alternate Public Defender's Office on November 9, 2015
16 with the Selection Committee to discuss two (2) Nevada Supreme Court's
17 decisions, Coleman and Hoffman. The Committee wanted to hear her side. Ex. 15.

18 Wilson immediately prepared a history of the two cases and placed their
19 contents within two binders for the Model Court Selection Committee's review.
20 Ex. 16 (Coleman) and Ex. 17 (Hoffman).

21 //

1 Upon arrival at the meeting, Wilson brought legal counsel, Michael E. Wilson,
2 Esq. and two independent contractor paralegals to provide any assistance to the
3 five (5) members of the Model Court Selection Committee.
4

5 The November 9, 2015 meeting was held without a court reporter. Ms. Lunt
6 advised Wilson, "We received this complaint from Chief Deputy District Attorney
7 Terrence P. McCarthy regarding these two Nevada Supreme Court decisions." Ex.
8
9 6.

10 One of the members stated, "You must have really 'pissed off' somebody over
11 in the District Attorney's Office." At least three (3) of the five members
12 acknowledged this expression stating, "You better cross all your T's and dot all
13 your I's." Ex. 6.

15 Contrary to the casual nature of the email request to appear, the meeting was
16 very adversarial and when Wilson's husband, Michael E. Wilson, attempted to
17 explain some unfair treatment practices over the years, he was told to "shut up, we
18 don't want to hear from you," by Member Lumkes. Ex. 15. (affidavit of Mike)

20 When Wilson requested whether her two assistants could also attend the
21 meeting, she was told "No." Ex. 6.

23 Approximately one (1) hour later after Wilson attempted to explain the history
24 of both Supreme Court decisions, the two (2) binders were provided to the Model
25 Court Selection Committee to review at their leisure. Ex. 6.

1 Upon leaving the conference room, Ms. Lunt advised Wilson, "No further cases
2 would be given to [her] until a decision was made and they would contact [her]
3 with a decision." Ex. 6.
4

5 During the following ten (10) months, Wilson received one (1) case, D'Vaughn
6 King. Ex. 6.

7 The Second Judicial District Court – Indigent Defense Report Implementing the
8 Matter of the Review of Issues Concerning Representation of Indigent Defendants
9 in Criminal and Juvenile Delinquency Cases (ADKT No. 411) does not provide for
10 any formal hearing or any other due process to protect post conviction counsel
11 from arbitrary and capricious actions, which should include a meaningful due
12 process hearing. Since these decisions of the Model Court Selection Committee
13 can result in putting counsel completely out of business and adversely affect the
14 Constitutional rights of clients, basic due process rights should apply.
15

16 These should include a court reporter so that any action taken can be reviewed.
17 Additionally, the Appointed Counsel should have the right to counsel, cross-
18 examine witnesses against them, and call witnesses in their favor.
19

20 Another interesting factor that occurred after the November 9, 2015 meeting,
21 the Court Administrator, Robert C. Bell, sent an email regarding self-reporting
22 pursuant to ADKT 411. Ex. 21.
23

24 //
25

1 Much like the Parole Board did in *Steve Dell McNeill v. The State of Nevada*,
2 123 Nev., Advance Opinion 54, No. 66697, filed July 28, 2016, the Parole Board
3 gave themselves power that were never granted.
4

5 According to the Second Judicial District Court – Indigent Defense Report, the
6 contract must be subject to termination annually or sooner, if determined by The
7 Appointed Counsel Selection Committee that a contract attorney is not abiding by
8 the standard guidelines for qualification of appointed counsel. Ex. 5, V. B. 1. (3).

9
10 There are no provisions for sanctions being imposed during an investigation,
11 like blocking the assignment of any new cases for ten (10) months, which was
12 done to Wilson on November 9, 2015.
13

14 There are no standards listed or implied that would allow the Model Court
15 Selection Committee to impose sanctions or terminate the contract. Ex. 5.

16 The Model Court Selection Committee in an act of hindsight, required the Court
17 Administrator, Robert C. Bell, send Appointed Counsel a new set of rules called
18 “Self-Reporting,” which was neither officially adopted into the ADTK 411 nor
19 adopted by the Second Judicial District Court Order implementing ADKT 411. Ex.
20
21 4 and 5.

22 Much like the Parole Board in McNeill, the Model Court Selection Committee
23 never sought leave from this Court or the Second Judicial District Court to amend
24 ADKT 411 or its implementation Order. Ex. 21.

1 It is important to note that this new “Self-Reporting” rule was sent to the
2 contract attorneys on February 26, 2016, three (3) months after the November 9,
3 2016 meeting against Wilson.
4

5 As such, the Model Court Selection Committee has acted as self-appointed
6 investigator, judge, jury, and executioner against Wilson.
7

8 The final decision made pursuant to the letter dated August 18, 2016 by the
9 Model Court Selection Committee was held secretly, with no way of knowing
10 whether all five members attended, whether only a quorum of the members were
11 present, whether the vote was unanimous, by a majority of the whole or a majority
12 of a quorum, whether the standard of proof was beyond a reasonable doubt, a
13 preponderance of the evidence, or slight or marginal. Ex. 1.
14

15 As such, the Model Court Selection Committee acted outside of basic due
16 process rights, which will result in Wilson’s going out of business. Ex. 6.
17

18 More importantly, the letter of August 18, 2016, from the Model Court
19 Selection Committee, violates the spirit and purpose of ADKT No. 411 when
20 demanding Wilson’s open and pending clients are reassigned a new lawyer. Ex. 1
21 and Ex. 5.
22

23 //

24 //

1 III. The Model Court Selection Committee was not qualified to evaluate
2 Wilson's performance since no member is a post conviction lawyer

3 The Model Court Selection Committee must be appointed by the Court
4 Administrator, Robert C. Bell and have the following qualifications for the five (5)
5
6 attorneys:

7 (1) have no pecuniary interest in the outcome of the attorney selection or
8 performance evaluation process;

9
10 Two of the five Model Court Selection Committee members, Jennifer Lunt,
11 Alternate Public Defender, and Jeremy Bosler, Washoe County Public Defender,
12 head offices where Wilson alleged ineffective assistance of counsel against their
13 deputies.

14
15 Interestingly, the only two correspondences Wilson received were from these
16 two people. Ex. 1 and 10.

17 Arguably, the continued employment with Washoe County of these two
18 individuals, Ms. Lunt and Mr. Bosler, is directly related to the competency of the
19 attorneys they have hired to work under their direction and control.

20 //
21 //
22 //
23 //
24 //
25 //

1 As such, these two committee members have a pecuniary interest in removing
2 Wilson from the Appointed Counsel list and should not be on the Model Court
3 Selection Committee.¹
4

5 Regarding the open and pending cases Wilson has, the following trial counsel's
6 have been alleged to be ineffective:
7

8 Robert Adam McGuffey, CR12-0465, had John Malone from the
9 Alternate Public Defender's Office;

10 Miguel Omar Ojeda-Enriquez, CR11-0482, had Joseph Merkin from the
11 Washoe County Public Defender's Office;

12 Ignacio Valencia, CR10-2173, had Alternate Public Defender, Jennifer
13 Lunt and Patrick McGinnis;

14 Mohamed Kamalaudeen, CR08-0196, had Maizie Pusich and Jay Slocum
15 from the Washoe County Public Defender's Office;

16 David Sanchez-Dominguez, CR10-0866, had Mary Pat Berry from the
17 Alternate Public Defender's Office;

18 Luis Eduardo Martinez, CR13-1937, had Dennis Hough from the Washoe
19 County Public Defender's Office;

20
21
22
23
24
25

¹ Jennifer Lunt had been alleged to be ineffective in Wilson's case of *Gilbert White v. Warden*, CR07P1540.

1 Anthony Eugene Thomas, CR09-0207, had Rich Davies and Jim Leslie of
2 the Washoe County Public Defender's Office;

3 Craig Allen Hoffman, CR11-1278, had Jay Slocum of the Washoe County
4 Public Defender's Office.

5 (2) have no legal, financial or familial relationship to any attorney whose
6 qualification or performance will be evaluated;

7 (3) are not directly related to the judiciary or any prosecution function;

8 In this regard, at the only meeting between Wilson and the Model Court
9 Selection Committee on November 9, 2015, the members advised Wilson, "We
10 received this complaint from Chief Deputy District Attorney Terrence P. McCarthy
11 regarding these two Nevada Supreme Court decisions." One member stated, "You
12 must have really 'pissed off' somebody over in the District Attorney's Office." At
13 least three (3) of the five members acknowledged this expression stating, "You
14 better cross all your T's and dot all your I's." Ex. 6.

15 The interference by the Washoe County District Attorney's Office, through
16 Chief Appellate Deputy District Attorney Terrence P. McCarthy, regarding the
17 three (3) cases where he was involved and acted as opposing counsel against
18 Wilson created a clear conflict of interest for the Model Court Selection
19 Committee and violated the provision where the Committee members should be
20 free from any prosecutorial function.

1 As stated, in all three cases brought by Chief Appellate Deputy District
2 Attorney Terrence P. McCarthy, Coleman, Hoffman, and Mattoon, the State lost,
3 making it appear that Mr. McCarthy acted begrudgingly against Wilson. Exs. 7, 8,
4 14, and 18.

5 In the Mattoon case, Chief Appellate Deputy District Attorney Terrence P.
6 McCarthy verbally opposed Ms. Mattoon's withdrawal of her petition, despite
7 Mattoon receiving emotional benefit from her decision, since she could keep her
8 position in the Dog Program and employment with Prison Services while serving
9 her last two (2) years in Florence McClure Correctional Center, Las Vegas,
10 Nevada. Ex. 6 (affidavit regarding the telephone conference with Sattler) and 13.

11 As such, the Model Court Selection Committee was unduly influenced by
12 Wilson's opposing counsel, Chief Appellate Deputy District Attorney, Terrence P.
13 McCarthy, in the target cases of Coleman, Hoffman, and Mattoon.

14 This added pressure placed upon the Alternate Public Defender, Jennifer Lunt,
15 and Washoe County Public Defender, Jeremy Bosler, should render the decision to
16 remove Wilson from the Appointed Counsel list null and void.

17 (4) have an interest in the variety of types of cases that are represented by the
18 appointed counsel lists to be selected by the Committee.

19
20
21
22
23
24 Ex. 5, V. A. 1. a. (1-4).
25

1 IV. The Model Court Selection Committee's directive to take away all open
2 and pending cases violates ten (10) indigent client's Sixth Amendment
3 rights to meaningful effective assistance of counsel
4

5 Open and Pending Cases

6 The following cases are open and pending, which have been worked
7 upon by Wilson, her assistants, investigators, and expert witnesses since
8 the time of appointment, which in most every case amount to years.
9

10 These indigent clients have not complained about Wilson and are
11 awaiting resolution of their cases. Although they do not have the right to
12 particular counsel, to reassign new post conviction counsel at this time
13 would violate the intent of ADKT No. 411 and violate their Sixth
14 Amendment rights to enjoy a meaningful relationship with counsel, which
15 have taken years to develop, proven by the date of initial appointment.
16

17 Codie Michael Scott Walker, CR12-0319A, Department 3,
18

19 Murder, appointed July 1, 2015, Evidentiary Hearing, March 29,
20 2017

21 Robert Adam McGuffey, CR12-0465, Department 6, Burglary,
22 appointed January 22, 2015, Evidentiary Hearing, September 22,
23 2016
24

1 Miguel Omar Ojeda-Enriquez, CR11-0482, Department 7,
2 appointed July 16, 2014, Sexual Assault of Child Under the Age
3 of Fourteen Years, Re-Opening of Evidentiary Hearing, March
4 3, 2017, Motion to Stay in this Court, 69963

5
6 Ignacio Valencia, CR10-2173, Department 7, appointed January
7 29, 2014, Sexual Assault of a Child Under the Age of Fourteen
8 Years, Evidentiary Hearing, February 10, 2017

9
10 Aurora Rodriguez-Perez, CR11P1020B, Department 7,
11 appointed April 1, 2013, Murder, Appeal due October 26, 2016,
12 70745

13
14 Mohamed Kamalaudeen, CR08-0196, Department 7, appointed
15 December 15, 2010, Murder, Awaiting decision on Appeal,
16 69247

17
18 D'Vaughn King, CR12-1160, Department 7, appointed March
19 24, 2016, Murder

20
21 David Sanchez-Dominguez, CR10-0866, Department 8,
22 appointed September 5, 2014, Murder, Awaiting decision on
23 Appeal, 70622

24
25 Jose Francisco, CR12-2051, Department 8, appointed December
8, 2014, Trafficking, Evidentiary Hearing, January 19, 2017

1 Luis Eduardo Martinez, CR13-1937, Department 9, appointed
2 May 21, 2015, Discharging a Firearm into a Car and Residence
3 in Furtherance of Gang Activity, Awaiting decision on Appeal,
4
5 69641

6 Donald Jackson, CR12-1617, Department 9, appointed
7 September 22, 2015, Murder of Child
8
9 Anthony Eugene Thomas, CR09-0207, Department 10,
10 appointed December 20, 2013, Sexual Assault of a Child Under
11 the Age of Fourteen Years, Evidentiary Hearing, September 15,
12 2016
13

14 Airell Sawyer, CR06P1022, Department 10, appointed July 11,
15 2008, Murder, Awaiting decision on Petition for Re-Hearing,
16 67829

17 Robert Schnueringer, CR12-0326A, Department 10, appointed
18 February 27, 2015, Murder, Evidentiary Hearing, January 4,
19 2017

20 Most disturbing, two (2) of the open and pending cases are set for evidentiary
21 hearings, which demand professional preparation on September 15th and 22nd in the
22 Second Judicial District Court, Departments 10 and 6, Anthony Thomas and
23
24 Robert McGuffey.

1 The letter of August 18, 2016 demanded that Wilson stop working immediately
2 and no compensation for cases would be provided from that date forth. Ex. 1. As
3 such, these two (2) indigent clients would particularly suffer.
4

5 In conclusion, Wilson, requests this Court prohibit the Model Court Selection
6 Committee from enforcing its decision to preclude Wilson from receiving any new
7 cases from the Court Administrator and take away all open and pending cases;
8 remove the Alternate Public Defender and Washoe County Public Defender from
9 the Committee; preclude members of the Washoe County District Attorney's
10 Office from interfering with the Committee's decision-making; and mandate the
11 Committee to reinstate Wilson to retain the ten (10) open and pending cases. Ex. 4,
12 ADKT 411 Ex. 5, A, pp. 18-22.
13
14

15 DATED this 26th day of August, 2016.
16

17 By: s/s: **MARY LOU WILSON**
18 **MARY LOU WILSON**
19 **Attorney At Law Bar #3329**
20 **333 Marsh Ave.**
21 **Reno, Nevada 89509**
22 **775-337-0200**
23
24
25

CERTIFICATE OF SERVICE

I, Mary Lou Wilson, hereby affirm that on the 26th day of August, 2016, I e-filed the aforementioned document through the Master List of e-filers and sent a hard copy through the U.S. Mail to the following:

Tracie Lindeman (e-filed)
Clerk of the Nevada Supreme Court
201 South Carson Street
Carson City, Nevada 89701

Jennifer Lunt (hard copy hand-delivered)
(A representative of the Model Court Selection Committee)
Alternate Public Defender
350 South Center Street, 6th Floor
Post Office Box 11130
Reno, Nevada 89520-0027

CODIE MICHAEL SCOTT WALKER (U.S. Mail)
Inmate Number 1095466
Loveland Correctional Center
1200 Prison Road
Loveland, Nevada 89419

ROBERT ADAM MCGUFFEY (U.S. Mail)
Inmate Number 1040469
Lovelock Correctional Center
1200 Prison Road
Lovelock, Nevada 89419

MIGUEL OMAR OJEDA-ENRIQUEZ (U.S. Mail)
Inmate Number 1097532
Loveland Correctional Center
1200 Prison Road
Loveland, Nevada 89419

1 IGNACIO VALENCIA (U.S. Mail)
2 Inmate Number 1085914
3 Lovelock Correctional Center
4 1200 Prison Road
Lovelock, Nevada 89419

5 AURORA RODRIGUEZ-PEREZ (U.S. Mail)
6 Inmate Number 1090026
7 Florence McClure Correctional Center
4370 Smiley Road
8 Las Vegas, Nevada 89115

9 MOHAMED KAMALAUDEEN (U.S. Mail)
10 Inmate Number 1028281
Northern Nevada Correctional Center
11 P.O. Box 7000
Carson City, Nevada 89702

12 D'VAUGHN KING (U.S. Mail)
13 Inmate Number 1115593
Northern Nevada Correctional Center
14 P.O. Box 7000
15 Carson City, Nevada 89702

16 DAVID SANCHEZ-DOMINGUEZ (U.S. Mail)
17 Inmate Number 1097532
Northern Nevada Correctional Center
18 P.O. Box 7000
19 Carson City, Nevada 89702

20 JOSE FRANCISCO (U.S. Mail)
21 Inmate Number 1108909
Southern Desert Correctional Center
22 P.O. Box 208
23 Indian Springs, Nevada 89070-0208

1 LUIS EDUARDO MARTINEZ (U.S. Mail)
2 Inmate Number 1118719
3 High Desert State Prison
4 P.O. Box 650
Indian Springs, Nevada 89070

5 DONALD JACKSON (U.S. Mail)
6 Inmate Number 1113011
7 Ely State Prison
8 P.O. Box 1989
Ely, Nevada 89301

9 ANTHONY EUGENE THOMAS (U.S. Mail)
10 Inmate Number 91694
Lovelock Correctional Center
11 1200 Prison Road
Lovelock, Nevada 89419

12 AIRELL SAWYER (U.S. Mail)
13 Inmate Number 92925
Lovelock Correctional Center
14 1200 Prison Road
Lovelock, Nevada 89419

16 ROBERT SCHNUERINGER (U.S. Mail)
17 Inmate Number 1097645
Southern Desert Correctional Center
18 P.O. Box 208
Indian Springs, Nevada 89070-0208

1 **Exhibits in Support of Petition for Writ of Mandamus**
2

3 **Exhibit 1, Letter from Jennifer Lunt, dated August 18, 2016**

4 **Exhibit 2, Email to Robert Bell's Office Regarding Hearing Dates**

5 **Exhibit 3, Letter to Robert Bell's Office Regarding Open Cases**

6 **Exhibit 4, Nevada Supreme Court, ADKT 411, 2008**

7 **Exhibit 5, Washoe County District Court Order Regarding ADKT 411**

8 **Exhibit 6, Affidavit of Mary Lou Wilson**

9 **Exhibit 7, Nevada Supreme Court Order of Reversal and Remand on Coleman**

10 **Exhibit 8, Nevada Supreme Court Order Granting Writ of Mandamus on Hoffman**

11 **Exhibit 9, Petition for Writ of Mandamus on Hoffman**

12 **Exhibit 10, Letter from Jeremy Bosler**

13 **Exhibit 11, Email from Mary Lou Wilson to Jeremy Bosler, June 28, 2016**

14 **Exhibit 12, Email from Mary Lou Wilson to Jeremy Bosler, July 2, 2016**

15 **Exhibit 13, Transcript of Hearing, Mary Anne Mattoon**

16 **Exhibit 14, Letter to Jeremy Bosler from Mary Lou Wilson, July 2, 2016**

17 **Exhibit 15, Email from Jennifer Lunt, November 4, 2015**

1 **Exhibit 16, Coleman Case Documents**

2 **Exhibit 17, Hoffman Case Documents**

3 **Exhibit 18, Exhibits to Jeremy Bosler in Support of the Letter**

4 **Exhibit 19, Letter from Client Craig Hoffman**

5 **Exhibit 20, Affidavit of Michael E. Wilson**

6 **Exhibit 21, Self-Reporting Memorandum**

EXHIBIT 2
Affidavit of MARY Lou Wilson.

PGS - 10F1

EXHIBIT 2

1 **AFFIDAVIT OF MARY LOU WILSON**

2 STATE OF NEVADA)
3) : ss
4 COUNTY OF WASHOE)

5 I, MARY LOU WILSON, hereby swear under penalty of perjury that the following is a true
6 statement:

7 That I am the lawyer in good standing with the Nevada State Bar, admitted to practice law since
8 1987, and am one of the Petitioners in the above-entitled action;

9 That I represent the listed Petitioners in the above-entitled action; some of which are open and
10 pending cases in the Second Judicial District Court and others are open and pending cases in the
11 Nevada Supreme Court;

12 That I authored the aforementioned action;

13 **Regarding the Law Office of Mary Lou Wilson, Inc. going out of business**

14 On pages thirteen (13) and fifteen (15), of the Petition for Writ of Mandamus or Prohibition,
15 shown as Exhibit 6, it alleged that the impact of the Model Court Selection Committee's letter
16 would result in the my office going out of business;

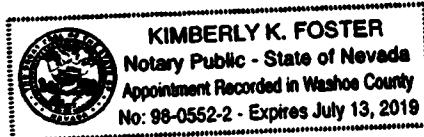
17 I have restricted my practice to only court appointed cases; most of these cases are from the
18 Court Administrator, Robert C. Bell, which are practiced in the Second Judicial District Court;
19 and upon compliance with the Model Court Selection Committee's letter would result in closing
20 the Law Office of Mary Lou Wilson, Inc.

21 DATED this 29 day of August, 2016.

22 
23 MARY LOU WILSON

24 Subscribed and sworn to before me this 29th day of August, 2016, by
25 xx Mary Lou McSweeney-Wilson. xx

Kimberly K. Foster
26 NOTARY PUBLIC



1 **CERTIFICATE OF SERVICE BY MAILING**

2 I, Robert, Nathan McGuire, hereby certify, pursuant to NRCP 5(b), that on this 8/4/16
3 day of September, 2016, I mailed a true and correct copy of the foregoing, "Motion For
4 ORDER TO STOP ATTACK ON MARY LOU WILSON"
5 by placing document in a sealed pre-postage paid envelope and deposited said envelope in the
6 United State Mail addressed to the following:

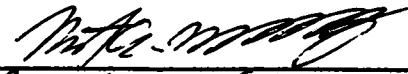
7
8 Attorney General
9 Nevada
555 E Washington Ave
Suite 3500
Las Vegas, NV 89101

6 Clerk of the US Dist
Court Dist of Nevada Suite
301 400 S. Virginia St
Reno, NV 89501

11
12 MARY LOU WILSON FSO
333 MARSH AVE
Reno, NV, 89509

13
14
15
16
17 CC:FILE

18
19 DATED: this 6/4 day of September, 2016.

20
21 
22 Robert McGuire # 1040469
23 In Propria Personam
Post Office Box 208, S.D.C.C. L.C.C.
Indian Springs, Nevada 89018 1200 PR:50-1 R2
24 IN FORMA PAUPERIS: Las Vegas, NV, 89101

AFFIRMATION
Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding Motion for
Order to Stop the Attack on Mary Lou Wilson
(Title of Document)

U.S.
filed in District Court Case number 3:16-cv-00356

Does not contain the social security number of any person.

-OR-

Contains the social security number of a person as required by:

A. A specific state or federal law, to wit:

(State specific law)

-OR-

B. For the administration of a public program or for an application
for a federal or state grant.

Robert McGiffey
Signature

9-8-2016
Date

Robert McGiffey - 1040469
Print Name

PAO - Se
Title